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California Law Review

Published by the Faculty and Students of the School of Jurisprudence of the University of California, and issued Bi-monthly throughout the Year

Subscription Price, $3.50 Per Year Single Copies, 65 Cents

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SUMMER SESSION

The School of Jurisprudence will offer several courses in law during the Summer Session of 1921, commencing June 20 and ending July 30. Samuel Williston, Weld Professor of Law in the Law School of Harvard University, will give a double course in the Law of Contracts. Professor Williston will be remembered by former Summer Session students of law from his lecture courses in the University of California in 1909 and 1915. The completion of his work, the Law of Contracts, during the past year has made it possible for him to spare the time to revisit California.

Robert M. Davis, A. B., Harvard, 1905, and J. D., University of Chicago Law School, 1908, now professor of law in the University of Arizona, will lecture on the Law of Corporations.

Charles G. Neeley, Professor of Constitutional History and Law in Pomona College, offers a double course in Elementary Law.

Dr. Jau Don Ball, Lecturer in the Summer Session, will give a general course in Criminology, covering mental disorders, feeble-mindedness, disease, heredity, etc., and a special course for advanced students in psychiatry from individual, social and industrial points of view. Much interest is being shown by the police of the Pacific Coast states in the courses to be offered by Edward Oscar Heinrich, consulting expert in criminal investigations of San Francisco, and August Vollmer, Chief of Police of Berkeley, on Field and Laboratory Methods in Criminal Investigations. Several police departments will send representatives to the Summer Session. *R. P.*

SCHOOL OF JURISPRUDENCE NOTES

We note, with much regret, the resignation of Edward Elliott, Professor of International Law and Politics. Dr. Elliott, who has been a Director of the Federal Reserve Bank of San Francisco since 1917, has now become Vice-President of the Security Trust and Savings Bank of Los Angeles. Owing to this resignation and the continued leave of absence of Professor Matthew C. Lynch, several changes have been made in the curriculum. The course in International Law is now being given by Professor G. H. Robinson. Professor Radin is giving the course in Trusts. Mr. W. W. Ferrier, A. B., University of California, 1912, J. D. 1914, has been appointed Lecturer in Law and is giving the course in Equity I.

Comment on Recent Cases

ATTACHMENT: DOES NOT ISSUE FOR BREACH OF CHARTER PARTY—Is an action for breach of a charter party an action on a contract express or implied for the direct payment of money within the meaning of the California code?[1] This question arose in *Greenebaum v. Smith*[2], which was a suit for breach of a charter party to provide a cargo at certain rates per ton. The cargo was not furnished as agreed and the shipowner sued for the breach in the state court and attached property of the defendant. The court held that the action did not fall within the description of the Code section and writ of attachment could not issue. This holding is

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[1] Cal. Code Civ. Proc. § 537.
[2] (Oct. 7, 1920) 33 Cal. App. Dec. 307.